

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

IRONBURG INVENTIONS LTD,

Plaintiff,

v.

BATTLE BEAVER, LLC,

Defendant.

Case No.: 3:22-CV-00686-X

Hon. Brantley Starr

**DEFENDANT’S UNOPPOSED MOTION FOR EXTENSION OF TIME  
TO ANSWER OR OTHERWISE RESPOND TO THE COMPLAINT**

Defendant Battle Beaver, LLC respectfully moves the Court for an order extending Defendant’s time to answer or otherwise respond to the Complaint for Patent Infringement (the “Complaint”). In support of this motion, Defendant states as follows:

1. Plaintiff Ironburg Inventions Ltd. filed its Complaint on March 24, 2022.
2. Defendant was served on March 28, 2022.
3. Pursuant to Federal Rule of Civil Procedure 12(a), Defendant’s response to the Complaint is due April 18, 2022.
4. Defendant seeks a 30-day extension of this deadline, such that Defendant’s response to the Complaint is due May 18, 2022.
5. The requested extension will allow Defendant’s counsel to familiarize itself with the facts of the case, investigate the allegations, and prepare an appropriate response.
6. This is Defendant’s first request for additional time in this action, and neither party will be prejudiced by the extension.

7. On April 12, 2022, Defendant's counsel emailed Plaintiff's counsel regarding the requested extension. On the same day, Plaintiff's counsel confirmed that Plaintiff does not oppose this motion.

Based on the foregoing, Defendant respectfully requests that the Court grant this unopposed motion for an extension of time to answer or otherwise respond to the Complaint.

DATED: April 13, 2022

/s/ William T. Reid, IV

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*Counsel for Defendant Battle Beaver, LLC*

**CERTIFICATE OF CONFERENCE**

I HEREBY CERTIFY THAT ON April 12, 2022, the undersigned counsel consulted with counsel for Plaintiff, Brian Vanderwoude, who consented to the relief requested by this motion.

/s/ Jeremy H. Wells

Jeremy H. Wells

**CERTIFICATE OF SERVICE**

I hereby certify that, on April 13, 2022, the foregoing document was filed electronically via the Court's ECF System, which effects service upon counsel of record.

/s/ Jeremy H. Wells

Jeremy H. Wells